

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

THOMAS G. KEEFE and DAWN K. KEEFE,)
individually and on behalf of those similarly situated,)

Plaintiffs,

VS.

EVERGREEN INVESTMENT MANAGEMENT
CO LLC, EVERGREEN FIXED INCOME TRUST,
EVERGREEN INVESTMENT SERVICES, INC.,
and EVERGREEN DISTRIBUTOR, INC., DENNIS
H. FERRO, KASEY PHILLIPS, CHARLES A.
AUSTIN III, SHIRLEY L. FULTON, K. DUN
GIFFORD, LEROY KEITH, JR., GERALD M.
McDONNELL, PATRICIA B. NORRIS, WILLIAM
WALT PETTIT, DAVID M. RICHARDSON,
RUSSELL A. SALTON III, MICHAEL S.
SCOFIELD, RICHARD J. SHIMA, and RICHARD
K. WAGONER,

Defendants.

No. 1:08-cv-11064-NMG

CLASS ACTION

ALBERT KRANTZBERG and IRENE
KRANTZBERG, On Behalf of Themselves and
All Others Similarly Situated,

Plaintiffs,

VS.

EVERGREEN FIXED INCOME TRUST,
EVERGREEN DISTRIBUTOR, INC., WACHOVIA
CORPORATION, DENNIS H. FERRO and KASEY
PHILLIPS,

Defendants.

No. 1:08-cv-11326-NMG

CLASS ACTION

[Caption continued on following page.]

**DECLARATION OF BETSY EHRENBERG IN SUPPORT OF MOTION
OF THE EVERGREEN INVESTORS GROUP FOR CONSOLIDATION
OF RELATED ACTIONS APPOINTMENT AS LEAD PLAINTIFF
AND APPROVAL OF SELECTION OF LEAD COUNSEL**

GENEVIEVE M. MIERZWINSKI, on behalf)	No. 1:08-cv-11435-NMG
of herself and all others similarly situated,)	
)	<u>CLASS ACTION</u>
Plaintiff,)	
vs.)	
)	
EVERGREEN FIXED INCOME TRUST,)	
EVERGREEN INVESTMENT SERVICES,)	
INC., EVERGREEN INVESTMENT)	
MANAGEMENT COMPANY, LLC,)	
WACHOVIA CORPORATION, DENNIS H.)	
FERRO and KASEY PHILLIPS,)	
)	
Defendants.)	

Betsy Ehrenberg declares, under penalty of perjury:

1. I am a partner of Pyle, Rome, Lichten, Ehrenberg & Liss-Riordan, P.C., proposed Liaison Counsel in this action. I submit this Declaration in support of the Motion of the Evergreen Investors Group for Consolidation of Related Actions, Appointment as Lead Plaintiff and Approval of Selection of Lead Counsel.

2. Attached hereto as Exhibit A is a true and accurate copy of the first notice regarding the pendency of this action, published on Business Wire on June 23, 2008, by the plaintiff in the first-filed *Keefe* action.

3. Attached hereto as Exhibit B is a true and accurate copy of a loss chart presenting the transactions in the subject securities and summarizing the estimated losses of the Evergreen Investors Group at \$1,326,350 in connection with its purchases of shares of the Evergreen Ultra Short Opportunities Fund.

4. Attached hereto as Exhibit C are the Certifications of International Brotherhood of Electrical Workers Local 98, NECA Electrical Workers Joint Apprenticeship Training Trust Fund, and Robert Ercolini on behalf of First Agency Account LP.

5. Attached hereto as Exhibit D is a true copy of the firm resume of Coughlin Stoia Geller Rudman & Robbins LLP, proposed Lead Counsel for the Evergreen Investors Group.

6. Attached hereto as Exhibit E is a true copy of the firm resume of Page Perry, LLC, proposed Lead Counsel for the Evergreen Investors Group.

7. Attached hereto as Exhibit F is a true copy of the firm resume of Pyle, Rome, Lichten, Ehrenberg & Liss-Riordan, P.C., proposed Liaison Counsel for the Evergreen Investors Group.

DATED: August 22, 2008

s/ Betsy Ehrenberg

BETSY EHRENBURG

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on August 22, 2008, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send a Notice of Electronic Filing to all counsel of record.

s/ Betsy Ehrenberg

BETSY EHRENBURG